

Peter A. Wald  
Direct Dial: (415) 395-8006  
peter.wald@lw.com

505 Montgomery Street, Suite 2000  
San Francisco, California 94111-6538  
Tel: +1.415.391.0600 Fax: +1.415.395.8095  
www.lw.com

**LATHAM & WATKINS** LLP

FIRM / AFFILIATE OFFICES

Austin	Milan
Beijing	Munich
Boston	New York
Brussels	Orange County
Century City	Paris
Chicago	Riyadh
Dubai	San Diego
Düsseldorf	San Francisco
Frankfurt	Seoul
Hamburg	Shanghai
Hong Kong	Silicon Valley
Houston	Singapore
London	Tel Aviv
Los Angeles	Tokyo
Madrid	Washington, D.C.

February 24, 2023

**VIA ECF & HAND DELIVERY**

The Honorable Colleen McMahon  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street, Room 2550  
New York, NY 10007

Re: *In re Omnicom Group Inc. ERISA Litigation*, No. 1:20-cv-04141;  
Notification of Settlement

Dear Judge McMahon:

We write on behalf of all parties to notify the Court that, following extensive negotiations and with the assistance of experienced mediators, the parties reached an agreement this morning to settle this case in its entirety. A formal settlement agreement will be drafted and presented to the Court for approval as soon as practicable.

In the meantime, the parties request that the trial scheduled to begin on Monday be taken off calendar.

Respectfully,

Peter A. Wald  
Peter A. Wald (admitted *pro hac vice*)  
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)